



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

October 3, 2003
Via Fax and Overnight Delivery

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

RECEIVED

2003 OCT -3 PM 2: 26

T.R.A. DOCKET ROOM

Re: **Docket 03-00502; Implementation of County Wide Calling
Response of Z-Tel Communications, Inc.**

Dear Mr. Jones:

Z-Tel Communications, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Z-Tel Communications, Inc. is authorized to provide local and long distance telecommunications services in Tennessee, and is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

Z-Tel subscribes to the BellSouth TAR database and utilizes that information to comply with county-wide calling in Tennessee. This arrangement works smoothly and has not resulted in any known complaints.

Although this process works smoothly, the Company suggests that the TRA delineate criteria wherein traditional telecommunications boundaries are utilized including rate centers and exchanges. The company also requests that information be provided to the legislature regarding the onerous nature of compliance, that counties are not telecommunications boundaries and some telecommunications industry standard be imposed in lieu of county-wide calling.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Questions regarding this filing may be directed to my attention at (407) 740-8575 or via email at mbyrnes@tminc.com

Sincerely,

Monique Byrnes
Consultant to Z-Tel Communications, Inc.

cc: T. Seat - Z-Tel
File: Z-Tel - TN
TMS: TN0300y



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

October 3, 2003
Via Fax and Overnight Delivery

Mr. Ron Jones, Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

RECEIVED

2003 OCT -3 PM 2:26

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of Custom Teleconnect, Inc.**

Dear Mr. Jones:

Custom Teleconnect, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

Custom Teleconnect, Inc. has no presubscribed customers in Tennessee. All calls are operator treated from pay telephones or hospitality locations and are billed via LEC billing through a third party billing aggregator. Local calls would not normally route through the company if the customer follows the dialing instructions on the phone or tent card. To the extent that customers occasionally dial local calls as if they are long distance, Custom Teleconnect handles these incidental calls and bills them like any other toll calls. The company does not have the data bases necessary to identify intracounty calls on an NPA-NXX basis. If any customer calls to complain, identifying a billed call as intracounty, Custom Teleconnect would credit the entire charge for the call, including the operator handling charges that would otherwise apply even if the call usage had been \$0.00. Custom Teleconnect has received no such complaint to date.

The operational difficulties and expense of implementing real time intracounty toll free calling for operator handled calls are a true impediment for small competitors. The gains to the public would be miniscule compared to the cost. Custom Teleconnect suggests a mileage surrogate for small companies would be a reasonably inexpensive approach that could be easily implemented.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.
Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at mbyrnes@tminc.com

Sincerely,

Monique Byrnes
Consultant to Custom Teleconnect, Inc.

cc: M. Cauton, Custom Teleconnect
File: Custom Teleconnect - TN
TMS: TNx0302



210 N. Park Ave.
Winter Park, FL
32789

P.O. Drawer 200
Winter Park, FL
32790-0200

Tel: 407-740-8575
Fax: 407-740-0613
tmi@tminc.com

October 3, 2003
Via Fax and Overnight Delivery

Mr. Ron Jones
Director/Moderator
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37219-0412

RECEIVED

2003 OCT -3 PM 2: 26

T.R.A. DOCKET ROOM

**Re: Docket 03-00502; Implementation of County Wide Calling
Response of ACN Communication Services, Inc.**

Dear Mr. Jones:

ACN Communication Services, Inc. submits the original and thirteen (13) copies of this letter in response to your request for information in the above-referenced docket regarding implementation of county-wide calling.

ACN Communication Services, Inc. is authorized to provide long distance telecommunications services in Tennessee, and is in compliance with the toll free county-wide calling requirements mandated by Tennessee state law (T.C.A. § 65-21-114).

As a switchless reseller the company has been dependent upon the databases and systems of its underlying carrier. However, the company has recently subscribed to the TAR database offered by BellSouth for another state and is currently arranging for such a subscription in Tennessee. This will assist the company in its compliance efforts.

The company has no suggestions as to how the proposed workshop should proceed, but will offer any support required or requested by the TRA.

Please acknowledge receipt of this filing by returning, file-stamped the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.
Questions regarding this filing may be directed to my attention at (407) 740-8575 or via e-mail at mbyrnes@tminc.com.

Sincerely,

Monique Bynnes
Consultant to ACN Communication Services, Inc.

cc: D. Gonos, ACN
File: ACN - TN
TMS: TN0304x